

differences. Li discloses that, where it is determined that the change in a pixel is due to a lighting difference, the “gray-level value is copied from the corresponding pixel in the previous frame and assigned to the target pixel location.” *See*, Li at paragraph [0087].

Thus, the purpose of Li’s static region detection and duplication procedure is not directed at generating a modified Prediction coded image as recited in Claims 69 and 78. The Applicant’s specification indicates that Prediction coded images code using a movement-compensated prediction after a prior intra (I) or predicted (P) image. Thus, because Li’s static region detection and duplication procedure is based on differentiating between regions associated with motion and those associated with lighting differences and only modifying pixel values associated with lighting differences, Li’s process does not read on the analysis of movement-compensated Prediction coded images.

Furthermore, Li’s process of copying and assigning a gray-level value is distinct from “swapping two Prediction coded images” because it merely copies and assigns a gray-level pixel value to a target pixel location. As acknowledged by the rejection, the remaining pixel values that include a change corresponding to movement are not altered. Thus, Li’s static region detection and duplication procedure is distinct from “swapping of two Prediction coded images” because it merely alters pixel values and does not swap or substitute any images.

The result of Li’s static region detection and duplication procedure further distinguishes it from the method recited in Claims 69 and 78. For example, Li’s process includes copying and assigning a gray-level pixel value to target pixel to eliminate flickering and provide a correct viewing. In contrast, the swapped Prediction coded images as disclosed in the Applicant’s specification do not correspond to the P images which are required for a correct viewing. Indeed, the images can be replaced by random Prediction coded images. Thus, as set forth in Claims 69 and 78, the modified stream “results in a visually altered video sequence” that is “reconstructed” to the original coded stream. Accordingly, Li’s static region detection and duplication procedure does not provide for method that generates a modified stream including a modified Prediction coded image as set forth in Claims 69 and 78.

Accordingly, Li’s static region detection and duplication procedure does not cure the deficiency of Ando because it fails to teach or suggest a process comprising a “modified Prediction coded image being a randomly generated image or the result of swapping two Prediction coded images.” Tahara fails to cure this deficiency. Accordingly, the Applicant respectfully submits that Ando, Li and Tahara fail to teach, disclose or suggest each recited

feature of Claims 69-79. Reconsideration and withdrawal of the rejection are respectfully requested.

Claim 79 is rejected under 35 USC §103(a) as unpatentable over Ando, in view of Li, in further view of Tahara, in further view of Tinker. The Applicant respectfully submits that the rejected claims are not obvious in view of the cited publications.

As stated above, the combination of Ando, Li and Tahara fail to teach, disclose or suggest each recited feature, including a “modified Prediction coded image being a randomly generated image or the result of swapping two Prediction coded images, so that the modification from said at least one Prediction coded image results in a visually altered video sequence.” Further combination with Tinker fails to cure this deficiency. Accordingly, the Applicant respectfully submits that Claim 79 is not obvious in view of the cited publications. Reconsideration and withdrawal of the rejection are respectfully requested.

Claims 80-81 are rejected under 35 USC §103(a) as unpatentable over Wu, in view of Li, in further view of Tahara. The Applicant respectfully submits that the rejected claims are not obvious in view of the cited publications.

The rejection concedes that Wu fails to teach or suggest a “modified Prediction coded image being a randomly generated image or the result of swapping two Prediction coded images, so that the modification from said at least one Prediction coded image results in a visually altered video sequence.” As stated above, Li’s static region detection and duplication procedure fails to teach, disclose or suggest this recited feature and further combination with Tahara fails to cure this deficiency. Accordingly, the Applicant respectfully submits that Claims 80-81 are not obvious in view of the cited publications. Reconsideration and withdrawal of the rejection are respectfully requested.

In light of the foregoing, the Applicant respectfully submits that the entire application is now in condition for allowance, which is respectfully requested.

Respectfully submitted,



T. Daniel Christenbury  
Reg. No. 31,750  
Attorney for Applicant

TDC/vbm  
(215) 656-3381